UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

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PLAINTIFF'S MEMORANDUM IN SUPPORT MOTION TO SEAL

Plaintiff, by counsel, pursuant to Rule 5 of the Local Rules of the United States District Court for the Eastern District of Virginia, hereby moves to seal Exhibit 1 attached to Plaintiff's Response in Support of Motion to Compel and For Sanctions (Dkt. 50), as well as the portion of Plaintiff's memorandum that quotes a provision in Exhibit 1. In support thereof, Plaintiff states as follows:

Plaintiff needed to file Exhibit 1, which was designated as confidential by Defendant. Plaintiff also quoted directly from Exhibit 1, requiring the filing of the redacted memorandum. While Plaintiff disagrees that the Defendant properly designated the information as confidential, Plaintiff nonetheless moves the Court to temporarily seal the exhibit and memorandum in accordance with Local Rule 5 until such time as the Court may rule upon Defendant's designations.

Respectfully submitted, BRIAN TAYLOR	
By: /s/ Counsel	

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of April, 2016, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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